

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:) Chapter 11
)
VOYAGER DIGITAL HOLDINGS, INC., *et al.*¹,) Case No. 22-10943-MEW
)
Debtors.) (Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE

PLEASE TAKE NOTICE that pursuant to Rule 9010 of the Federal Rules of Bankruptcy Procedure, the attorney listed below of McElroy, Deutsch, Mulvaney & Carpenter, LLP, appears as counsel for the New Jersey Bureau of Securities (the “Bureau”) in the above-referenced matter, and pursuant to Rules 2002(g), 2002(i), and 9007, requests, unless otherwise directed by the Court, that all notices that are required to be given in these chapter 11 cases or in any related adversary proceeding, and all papers that are required to be served in this case be given to and served upon the undersigned, at the following address:

Jeffrey Bernstein, Esq. MCELROY, DEUTSCH, MULVANEY & CARPENTER, LLP 570 Broad Street Newark, NJ 07102 Phone: (973) 565-2183 jbernstein@mdmc-law.com

PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, service of copies of all papers, including but not limited to, reports, pleadings, motions, applications, petitions, schedules, complaints, demands, statements of financial affairs, operating reports, schedules of assets and liabilities, whether formal or informal, whether written or oral, and

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, or otherwise (or circulated drafts of any of the foregoing), and answering reply papers filed in the above-captioned case or any related adversary proceeding by mailing one copy of each, unless otherwise directed by the Court, to the above address.

PLEASE TAKE FURTHER NOTICE in accordance with Bankruptcy Rule 3017(a), this request also constitutes a request in writing for copies of any disclosure statement or plan filed in these chapter 11 cases.

PLEASE TAKE FURTHER NOTICE that the Bureau does not intend for this Notice of Appearance and Request for Notices and Service, nor any subsequent appearance, pleading, claim, or suit, to waive any rights to which it may be entitled including, but not limited to: (i) its right to have final orders in non-core matters entered only after *de novo* review by a District Judge; (ii) its right to trial by jury in any proceeding related to this case; (iii) its right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) any rights, claims, actions, defenses, setoffs, recoupments, or remedies to which the Bureau may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, recoupments and remedies the Bureau expressly reserves.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Notices and Service does not constitute an agreement to accept services of initial process under Rule 4, Fed. R. Civ. P., or Rule 7004, Fed. R. Bankr. P., nor shall it result in undersigned counsel being deemed to be the agent of the New Jersey Bureau of Securities for such purpose.

Dated: November 14, 2022

Respectfully submitted,

**McELROY, DEUTSCH, MULVANEY
& CARPENTER, LLP**

/s/ Jeffrey Bernstein

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Counsel for the New Jersey Bureau of Securities

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2022 the foregoing NOTICE OF APPEARANCE
AND REQUEST FOR SERVICE was filed and served electronically through the Court's
CM/ECF system.

MCELROY, DEUTSCH, MULVANEY
& CARPENTER, LLP

/s/ Jeffrey Bernstein
Jeffrey Bernstein